

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LANDSCAPE CONSULTANTS OF
TEXAS, INC., and METROPOLITAN
LANDSCAPE MANAGEMENT, INC.,

Plaintiffs,

v.

CITY OF HOUSTON, TEXAS, and
MIDTOWN MANAGEMENT DISTRICT,

Defendants.

Civil Action No. 4:23-cv-03516

**CITY OF HOUSTON'S
RESPONSES TO PLAINTIFFS'
REQUESTS FOR PRODUCTION OF DOCUMENTS**

TO: Plaintiffs Landscape Consultants of Texas, Inc. and Metropolitan Landscape Management, Inc., by and through their counsel of record.

Defendant City of Houston, Texas ("Defendant" or "the City") submits this as its Responses to Plaintiffs' Requests for Production of Documents.

Please note that the City's review of potentially responsive documents and materials is ongoing as of the date of these responses. The City will produce responsive documents on a rolling basis, to be completed no later than May 20, 2024. Please contact the undersigned with any questions or concerns regarding this proposal.

-signatures follow-

Respectfully submitted,

By: /s/ Ben Stephens
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ATTORNEYS FOR THE CITY OF HOUSTON

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of May, 2024, a true and correct copy of the foregoing was served on counsel of record by email.

/s/ Ben Stephens

Ben Stephens

and responsible bidder” standard, and bidders may or may not be awarded a contract for any number of reasons. Accordingly, this request is confusingly phrased and is not capable of being answered as written.

REQUEST FOR PRODUCTION NO. 9:

All documents relating to or supporting each compelling interest identified in Interrogatory No. 4.

OBJECTIONS:

Please refer to the City’s objections to Interrogatory No. 4, which are incorporated herein.

RESPONSE:

Subject to and without waiving the foregoing objections, responsive, non-privileged documents will be produced.

REQUEST FOR PRODUCTION NO. 10:

All documents relating to any draft, incomplete, or complete disparity study undertaken by Colette Holt & Associates for the City between January 1, 2016, to January 1, 2021, including monthly progress reports.

OBJECTION(S):

This request seeks information not relevant to any party’s claims or defenses and not proportionate to the needs of the case, and subject to the attorney-client and work-product privileges. Specifically, a draft or incomplete disparity study never adopted or relied upon by the City of Houston is not relevant and not important to resolving any disputed issue.